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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case) (Jointly Administered)

**NOTICE OF FILING OF PARTIES'
REVISED FEE EXAMINER PROTOCOL**

Re: Dkt. No. 3762
Date: October 23, 2019
Time: 10:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 **PLEASE TAKE NOTICE** that on January 29, 2019, PG&E Corporation and Pacific Gas
2 and Electric Company, as debtors and debtors in possession (collectively, the “**Debtors**”) in the
3 above-captioned chapter 11 cases, each filed a voluntary petition for relief under chapter 11 of title
4 11 of the United States Code with the United States Bankruptcy Court for the Northern District of
5 California (San Francisco Division) (the “**Court**”).

6 **PLEASE TAKE FURTHER NOTICE** that on August 30, 2019, the Court Appointed Fee
7 Examiner, Bruce A. Markell, (the “**Fee Examiner**”), filed a *Notice by Fee Examiner of the Terms*
8 *of Protocol regarding Submission of Fee Applications as required by Order Employing Fee*
9 *Examiner (Docket No. 2267), (Dkt. 3762)*, which filing included the *Fee Examiner Protocol For*
10 *Chapter 11 Cases of PG&E Corporation and Pacific Gas and Electric Company*, (Dkt. No. 3762,
11 Ex. A), (the “**Initial Protocol**”).

12 **PLEASE TAKE FURTHER NOTICE** that in accordance with the Court’s order at the
13 October 7, 2019 omnibus hearing to “meet and confer . . . to . . . come up with any improvements
14 or adjustments to the [Initial] [P]rotocol”, (Oct. 7, 2019 Hr’g Tr. 49:11-19), the Debtors, the Official
15 Committee of Tort Claimants (the “**TCC**”), the Official Committee of Unsecured Creditors
16 (the “**UCC**”), Andrew R. Vara, Acting United States Trustee for Region 3 (the “**United States**
17 **Trustee**”), and the Fee Examiner, (collectively, the “**Parties**”), met and conferred regarding the
18 terms of the Initial Protocol.

19 **PLEASE TAKE FURTHER NOTICE** the Parties hereby jointly submit this Revised Fee
20 Examiner Protocol (the “**Revised Protocol**”). The Parties believe that the Revised Protocol
21 resolves all the issues among the Parties with respect to the billing and expense practices addressed
22 in the Initial Protocol.

23 **PLEASE TAKE FURTHER NOTICE** that, attached hereto as **Exhibit 1** and **Exhibit 2**,
24 respectively, is a copy of the Revised Protocol and a copy of a redline comparison of the Revised
25 Protocol against the Initial Protocol.

26 **PLEASE TAKE FURTHER NOTICE** that if any fee applicant believes that the Revised
27 Protocol is inconsistent with the application of 11 U.S.C. § 330, the fee applicant is free to raise
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1 objections to the Revised Protocol at the time of the hearings on fee applications or at any other
2 hearing for which the Court wishes to hear such objections. The Fee Examiner reserves the right
3 to vary from the terms of the Revised Protocol based upon the specific facts of a particular
4 situation. Nothing in this Revised Protocol shall be deemed to limit the right of the United States
5 Trustee or other parties in interest to object to professional fees and expenses.

6 **PLEASE TAKE FURTHER NOTICE** that the Parties are jointly filing the Revised
7 Protocol as a notice, and neither this filing nor the Revised Protocol should be construed as an
8 order of the Court.

9 **PLEASE TAKE FURTHER NOTICE** that copies of the pleadings and other documents
10 for the above-captioned cases can be viewed and/or obtained: (i) by accessing the Court's
11 website at <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at
12 450 Golden Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors' notice and claims
13 agent, Prime Clerk LLC, at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217
14 (toll free) for U.S.-based parties; or +1 (929) 333-8977 for International parties or by e-mail at:
15 pgeinfo@primeclerk.com. Note that a PACER password is needed to access documents on the
16 Court's website.

17
18 Dated: October 24, 2019
19

20 CRAVATH, SWAINE & MOORE LLP

21 /s/ Paul H. Zumbro

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Court Appointed Fee Examiner

/s/ Bruce A. Markell